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Attorneys for Defendant,
SERGEANT TRAVIS KELLY
(Defendant is exempt from filing fees pursuant to Government Code § 6103)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA ASSIFF,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;
SHERIFF DEPUTY BADGE
NUMBER 404532; And DOES 1
through 10,

Defendants.

Case No.: 2:22-cv-05367 RGK(MAAx)

**STATEMENT OF QUALIFICATIONS
AND ANTICIPATED TESTIMONY OF
DEFENSE EXPERT**

Action Filed: August 3, 2022
Pretrial Conference: July 10, 2023
Trial Date: July 25, 2023

Assigned to:
Hon. R. Gary Klausner, District Judge
Courtroom 850

All Discovery Matters Referred to:
Hon. Maria A. Audero, District Judge

Defendant SERGEANT TRAVIS KELLY (“Defendant”) hereby submits its short narrative statement of the qualifications Expert Michael Gray and the testimony expected to be elicited at Trial.

Qualifications: Mr. Gray is a retired deputy sheriff (effective 02-05-2001), attaining the rank of Deputy Sheriff/Detective for the County of Los Angeles, California,

1 Sheriff's Department. He started in his career as a deputy sheriff in 1984 and worked in
2 that field until retirement. The assignments that he has worked were Custody, Patrol
3 Deputy, Traffic Enforcement Deputy, Field Training Officer (FTO), Station Detective,
4 and Detective Division. For eleven (11) years of my active law enforcement career, he
5 was a detective investigating property crimes such as burglary and vehicle theft and
6 crimes against persons including but not limited to; assaults, sexual assaults, child abuse,
7 and robbery. He has personally written over 300 search warrants and participated in the
8 service and execution of hundreds more. As a detective, he has conducted more than two
9 thousand investigations covering almost every area of law enforcement and has
10 conducted interviews of witnesses, victims, and suspects in the thousands.

11 In addition, he has been a Field Training Officer, a Trainer of new Detectives and
12 a classroom trainer for the Department and for the Training Center and has trained over
13 one thousand – seven hundred (1,700) California law enforcement personnel in various
14 aspects of investigations. He is a Trainer of Trainers, personally instructing over one
15 hundred-seventy (170) California law enforcement trainers in the Commission on POST
16 "Master Instructor Development Program" and over four hundred (400) California law
17 enforcement trainers in the Commission on POST "Institute of Criminal Investigations
18 Instructor Training Course." Many of the programs and training have a component of
19 interview and interrogation.

20 In 2016, Mr. Gray performed civil rights work for the Federal Department of
21 Justice – Civil Rights Division, as it relates to Use of Force training in an academy, Field
22 Training Officer program and In-Service training during a DOJ investigation of a major
23 mid-west city police department and has produced reports on observations and findings.

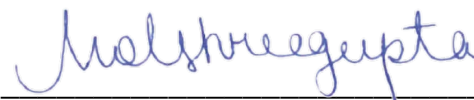
24 Currently, he is the Executive Director of the Intergovernmental Training and
25 Develop Center (ITDC) in San Diego, California; ITDC is a government training center,
26 training over 4,000 law enforcement personnel annually. As the Executive Director of
27 the ITDC, he is active as an executive, administrator, instructor, developer, author and
28 consultant and has responsibility for the oversight and administration of the ITDC

1 including the oversight of over three hundred fifty (350) instructors who teach in 62
2 different POST certified courses that the ITDC operates. He personally oversees thirteen
3 Commission on POST Institute of Criminal Investigation (ICI) courses, in which over
4 nine hundred (900) law enforcement investigators are trained each year, all of which
5 discuss in some form or fashion the laws of arrest and interview and interrogation with
6 current updated laws.

7 **Anticipated Testimony:** Mr. Gray has served as a police practices expert for both
8 plaintiff and defense. He will provide expert opinions regarding the standard of care and
9 duties of sheriff's deputies who conduct traffic stops in general and in particular the
10 standard of care and duties owed to Plaintiff in the underlying litigation. In addition, he
11 will provide testimony which will relate to the objective reasonableness of Defendant
12 Kelly's conduct during the incident. Mr. Gray's testimony and opinions will address the
13 conduct of Defendant Kelly, and all involved parties, relating to the facts alleged in the
14 operative complaint and determined through discovery and investigation.

15
16 Dated: July 5, 2023

KJAR, MCKENNA & STOCKALPER, LLP

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18 By: 
19 PATRICK E. STOCKALPER
20 MOLSHREE GUPTA
21 Attorneys for Defendants,
22 COUNTY OF LOS ANGELES and SERGEANT
23 TRAVIS KELLY
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CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On July 5, 2023, I served the foregoing document described as **STATEMENT OF QUALIFICATIONS AND ANTICIPATED TESTIMONY OF DEFENSE EXPERT** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is mnixon@kmslegal.com.

By Personal Service I caused such document to be Personally Served on the parties listed in the Service List.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 5, 2023, at El Segundo, California.



Maria Nixon

SERVICE LIST

Assiff, Joshua vs. County of Los Angeles, et al.

Central District- Case No.: 2:22-cv-05367 RGK(MAAX)

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